



**Health Department**  
**MULTNOMAH COUNTY OREGON**

Office of the Director

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April 13, 2011

Sarah Armitage  
Oregon DEQ  
Air Quality Planning

Dear Ms Armitage,

Multnomah County Health Department, representing the largest public health agency in the Portland Air Toxics Solutions (PATs) area, supports this recommendation as a long term reduction strategy that serves to reduce overall regional toxic emissions, and improves health outcomes through permitting rules changes.

PATs modeling show toxic emissions of prevalent toxics to be above benchmark in 2017. While emission reduction strategies will serve the public health interest by reducing overall emissions, public health principles would suggest that the rules by which DEQ grant new, expanded, or renewed permits should include a more stringent standard to protect public health.

Currently, Air Toxic Permits are done on a toxic by toxic, and facility by facility basis, which does not account for both acute exposures (for example heavy metals which can have neurological impacts, particularly for children that are not captured by lifetime or annualized exposure benchmarks) nor for cumulative risk, which is often greatest for those most vulnerable, including low income and minority communities which bear the greatest burden from environmental hazards and the associated health inequities resulting from them.

Multnomah County Health Department supports the recommendation made by Organizing People Activating Leaders (OPAL), Pacific Environmental Advocacy Center (PEAC), Neighbors for Clean Air, and North Portland representatives on the Portland Air Toxics Solutions Advisory Committee that require DEQ to create new rules related to their permitting process for toxics above benchmark. (While also acknowledging that public health would strongly encourage short term benchmark standards and cumulative risk assessment for future considerations by DEQ).

This recommendation specifically improves public health by assuring that DEQ and the permit holder conduct audits for permit renewal, with the expectation that this audit identifies current emissions and reduction strategies that exist. The recommendation also provides for public comment period as part of a broader public health principle of “right to know,” and the associated empowerment of communities to have greater involvement in decisions that affect their and their families’ health.

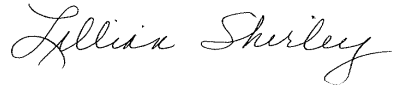


**Public Health**  
Prevent. Promote. Protect.

The Department of Environmental Quality is statutorily delegated to regulate industries that produce toxics that impact public health. To this end, it is critical that processes and procedures of the agency support this regulatory role by insuring that information is collected, shared, and used for decision-making and permitting.

Multnomah County Health Department is willing to provide staff input and support for any and all movement towards this end, and should be seen as an active partner.

Sincerely,

A handwritten signature in cursive script that reads "Lillian Shirley". The signature is written in black ink and is positioned below the word "Sincerely,".

Lillian Shirley, BSN, MPH, MPA